

LENOX, SOCEY, FORMIDONI, GIORDANO, COOLEY, LANG & CASEY

A LIMITED LIABILITY COMPANY
COUNSELLORS AT LAW

3131 PRINCETON PIKE - 1B, SUITE 104
LAWRENCEVILLE, NEW JERSEY 08648

RUDOLPH A. SOCEY, JR., P.C.^{††}
ROLAND R. FORMIDONI
ROBERT P. CASEY, P.C.
GREGORY J. GIORDANO[†]
JEREMY P. COOLEY^{††}
JOSEPH R. LANG[†]

(609) 896-2000

FAX (609) 895-1693

MICHAEL J. HERON*
ROBERT F. CASEY, P.C.
PATRICK F. CARRIGG***
MICHAEL A. PATTANITE, JR.
MICHAEL J. MASELLI
AMBIKA SAHANI

GEORGE WILGUS, III[†]
OF COUNSEL
SAMUEL D. LENOX
1922-1975

*MEMBER OF N.J. AND PA. BAR
**MEMBER OF N.J. PA & N.Y. BAR
***MEMBER OF N.J. & N.Y. BAR
†CERTIFIED AS A CIVIL TRIAL ATTORNEY

June 30, 2014

The Honorable Rya W. Zobel, U.S.D.J.
U.S. District Court, for District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, MA 02210

In re New England Compounding Pharmacy, Inc. Products Liability Litigation
Docket No. 1:13-md-2419-RWZ

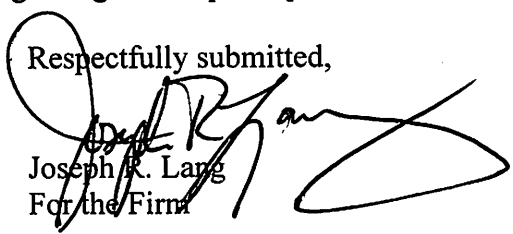
Re: Rivera v Bhagat, Docket No. 1:13-cv-10412-RWZ
1:13-md-2419-RWZ

Dear Judge Zobel:

Please be advised that this firm represents the defendant, Nitesh Bhagat, M.D., in the above-referenced matter. Currently pending before Your Honor is the Defendant's Motion to Dismiss for Plaintiff's failure to serve a proper affidavit of merit. This motion has been opposed. Today, Dr. Bhagat's reply to Plaintiff's opposition was filed. Accordingly, all briefing on this motion is concluded, and the Defendant respectfully requests that this matter be listed for oral argument before the Court. By copy of this correspondence, I am notifying my adversary and all other counsel of record of this request.

If Your Honor has any questions regarding this request, please do not hesitate to contact me.

Respectfully submitted,


Joseph R. Lang
For the Firm

cc: Mary T. Gidaro, Esq.
Michael Frank Barrett, Esq.
Steven A. Stadtmauer, Esq.
Stephen A. Grossman, Esq.
Walter R. Krzastek, Esq.